Diana Hynek 10/12/2004
Departmental Paperwork Clearance Officer
Office of the Chief Information Officer
14th and Constitution Ave. NW.
Room 6625

Washington, DC 20230

In accordance with the Paperwork Reduction Act, OMB has taken the following action on your request for approval of a new information collection received on 08/09/2004.

TITLE: An Observer Program for At-Sea Processing Vessels in the Pacific Coast Groundfish Fishery

AGENCY FORM NUMBER(S): None

ACTION : APPROVED WITHOUT CHANGE

OMB NO.: 0648-0500

EXPIRATION DATE: 10/31/2007

BURDEN:	RESPONSES	HOURS	COSTS(\$,000)	
Previous	0	0	0	
New	222	51	1	
Difference	222	51	1	
Program Change	е	51	1	
Adjustment		0	0	

TERMS OF CLEARANCE: None

OMB Authorizing Official Title

Donald R. Arbuckle Deputy Administrator, Office of

Information and Regulatory Affairs

PAPERWORK REDUCTION ACT SUBMISSION

Please read the instructions before completing this form. For additional forms or assistance in completing this form, contact your agency's

Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the supporting statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW, Washington, DC 20503. 1. Agency/Subagency originating request 2. OMB control number b. [] None 3. Type of information collection (*check one*) Type of review requested (check one) Regular submission a. [b. [Emergency - Approval requested by ____ a. [] New Collection Delegated b. [] Revision of a currently approved collection c. [] Extension of a currently approved collection 5. Small entities Will this information collection have a significant economic impact on a substantial number of small entities? [] Yes [] No d. [] Reinstatement, without change, of a previously approved collection for which approval has expired e. [] Reinstatement, with change, of a previously approved collection for which approval has expired 6. Requested expiration date f. [] Existing collection in use without an OMB control number a. [] Three years from approval date b. [] Other Specify: For b-f, note Item A2 of Supporting Statement instructions 7. Title 8. Agency form number(s) (if applicable) 9. Keywords 10. Abstract 11. Affected public (Mark primary with "P" and all others that apply with "x") 12. Obligation to respond (check one) a. __Individuals or households d. ___Farms
b. __Business or other for-profite. ___Federal Government] Voluntary Business or other for-profite. Federal Government

Not-for-profit institutions f. State, Local or Tribal Government Required to obtain or retain benefits 1 Mandatory 13. Annual recordkeeping and reporting burden 14. Annual reporting and recordkeeping cost burden (in thousands of a. Number of respondents b. Total annual responses a. Total annualized capital/startup costs 1. Percentage of these responses b. Total annual costs (O&M) collected electronically c. Total annualized cost requested c. Total annual hours requested d. Current OMB inventory d. Current OMB inventory e. Difference e. Difference f. Explanation of difference f. Explanation of difference 1. Program change 1. Program change 2. Adjustment 2. Adjustment 16. Frequency of recordkeeping or reporting (check all that apply) 15. Purpose of information collection (Mark primary with "P" and all others that apply with "X") a. [] Recordkeeping b. [] Third party disclosure] Reporting a. ___ Application for benefits Program planning or management 1. [] On occasion 2. [] Weekly Program evaluation f. Research 3. [] Monthly General purpose statistics g. Regulatory or compliance 4. [] Quarterly 5. [] Semi-annually 6. [] Annually 7. [] Biennially 8. [] Other (describe) 18. Agency Contact (person who can best answer questions regarding 17. Statistical methods Does this information collection employ statistical methods the content of this submission) [] Yes [] No Phone:

OMB 83-I 10/95

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9

NOTE: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8(b)(3), appear at the end of the instructions. *The certification is to be made with reference to those regulatory provisions as set forth in the instructions.*

The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It used plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention period for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of the provisions, identify the item below and explain the reason in Item 18 of the Supporting Statement.

Signature of Senior Official or designee Date

OMB 83-I 10/95

Agency Certification (signature of Assistant Administrator, Deputy Assistant Administrator, Line Office Chief Information Officer, head of MB staff for L.O.s, or of the Director of a Program or StaffOffice)			
Signature	Date		
Signature of NOAA Clearance Officer			
Signature	Date		

SUPPORTING STATEMENT FOR: AN OBSERVER PROGRAM IN THE AT-SEA PROCESSING SECTOR OF THE PACIFIC WHITING FISHERY OFF THE WASHINGTON-OREGON-CALIFORNIA COAST

INTRODUCTION

The U.S. groundfish fisheries off the Washington, Oregon, and California (WOC) coasts are managed pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) and the Pacific Coast Groundfish Fishery Management Plan (FMP). Regulations implementing the FMP appear at 50 CFR part, 660 Subpart G.

The Magnuson-Stevens Act at 16 U.S.C. 1853(b)(8) provides that an FMP may require that one or more observers be carried on-board a vessel of the United States engaged in fishing for species that are subject to the FMP, for the purpose of collecting data necessary for the conservation and management of the fishery. The Pacific Coast Groundfish FMP provides that all catcher/processors and at-sea processing vessels operating in the groundfish fishery may be required to accommodate on-board observers for purposes of collecting scientific data.

The WOC at-sea Pacific whiting fishery is a mid-water trawl fishery that is composed of large catcher-processor and mothership vessels. The catcher-processors harvest and process catch while the motherships rely on smaller catcher vessels to deliver unsorted catch for processing. These large processing vessels primarily operate in the Alaskan pollock (*Theragra chalocogramma*) fisheries, but move south to the WOC to fish for whiting between pollock seasons. While they participate in the pollock fishery, they are subject to 50 CFR Part 679, which specifies requirements related to observer services for the North Pacific (Alaskan) Groundfish fisheries.

Since 1991, the large at-sea whiting processing vessels have each voluntarily carried at least one NMFS-trained observer to provide data for estimating total landed catch and discards; monitoring the attainment of annual groundfish allocations; estimating catch rates of prohibited species; and assessing stock conditions. NMFS has come to depend on data from whiting observers to provide information critical to conservation and management of the marine resources.

For the most part, the at-sea whiting fishery has been satisfactorily monitored as a voluntary program. However, NMFS's ability to assure the integrity and availability of observer data in the future and to maintain safe working conditions for observers is constrained by the lack of regulations. To assure the integrity and availability of observer data in the future, NMFS now proposes to establish a mandatory observer program and mandatory observer coverage levels for all at-sea processing vessels in the Pacific Coast groundfish fishery. At-sea processing is currently confined to the Pacific whiting fishery. The proposed rule requires at-sea processing vessels greater than 125 ft (38.1 m) in length to carry two NMFS-certified observers while participating in the groundfish fishery. Vessels less than 125 ft (38.1 m) in length are required to carry one observer. Observers must be obtained, and paid for by the vessels, through third-party observer provider companies operating under permits issued by the NMFS Alaska Region. The proposed rule also specifies certification and decertification requirements for observers that will be administered by the Northwest Region of NMFS in Seattle, Washington, and defines the responsibilities of observers and processing vessels.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

Data collected by whiting observers are used by NMFS to estimate total landed catch and discards, monitor the attainment of annual groundfish allocations, estimate catch rates of prohibited species, and as a component in stock assessments. These data are necessary to comply with the Magnuson-Stevens Act requirements to prevent overfishing. In addition, the terms and conditions of the section 7 Endangered Species Act (ESA) consultation on the Pacific Coast groundfish fishery requires 100% observer coverage to account for incidental take of ESA listed salmon.

The proposed regulations for this observer program define certification, observer responsibilities and prohibited behaviors. It also establishes probation, suspension, and decertification measures that NMFS may take to discipline problem individuals. This process provides NMFS with a tool to ascertain if observers are fulfilling their responsibilities and duties as prescribed by NMFS. This process allows observers to submit evidence and to argue in opposition to a suspension or a decertification notice.

Information submitted by observer provider companies (transcripts, training and debriefing registration, notification of physical examination, projected observer assignments, observer weekly deployment/logistics reports, observer debriefing registration disclosure statement, and reports of observer harassment, observer safety concerns, or observer performance problems) is used to efficiently and effectively deploy well-qualified and trained fisheries observers to monitor the at-sea sectors of the Pacific whiting fishery.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Information submitted by the observer providers will be used as follows:

Training/briefing Registration. Prior to the beginning of a scheduled observer certification training session observer providers send the following information: date of requested training; a list of observer candidates that includes each candidate's full name (i.e., first, middle and last names), date of birth, and sex; a copy of each candidate's academic transcripts and resume; and a statement signed by the observer candidate under penalty of perjury which discloses the candidate's criminal convictions. The requested information ensures that sufficient class space will be reserved for the candidates during the training session requested and that each potential, new observer meets the observer educational qualification standards. The disclosure statement of criminal record is a new requirement intended to disclose the candidate's past criminal record that demonstrates an absence of criminal records related to: embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property, or the commission of any other offense indicating a lack of integrity or honesty that would seriously and directly affect the fitness of an candidate to fulfill the observer responsibilities.

<u>Notification of Observer's Physical Examination</u>. Physical examinations are necessary because working aboard vessels or in processors is a dangerous occupation. An individual must be physically fit with no safety-endangering conditions. Notification of the physical examination allows NMFS to verify that all observers meet standards in the program.

<u>Projected Observer Assignments</u>. This information is used by the training or briefing instructor to adapt classroom instruction to meet the specific needs of the individual(s) in the training or briefing class. It is also used by the instructor when giving "special project" assignments to students .This information must be submitted to the Observer Program Office prior to the completion of the training or briefing session and includes the following: the observer's name, vessel, port of embarkation

Observer Weekly Deployment/logistics Reports. An observer contractor must provide NMFS with a weekly deployment/logistics report during the period of time that an observer is deployed. The deployment/logistics report includes: the observer's name, cruise number, and current vessel. This information is used for routine record keeping in the NMFS observer database. Accurate and timely observer deployment information is important for fisheries management. Knowing where observers are at all times is also important should emergencies arise while an observer is deployed at sea.

Observer Debriefing Registration. This information allows for an efficient and effective debriefing process of an observer with NMFS personnel through a one-on-one interview. Observer debriefing registration information must include: the observer's name, cruise number, vessel, and requested debriefing date.

Reports of Observer Harassment, Observer Safety Concerns, or Observer Performance Problems. Review of these reports provides NMFS with an effective tool to monitor and enforce standards of conduct of observers and to identify problems on vessels that may compromise the observers health and well being. Reports on the following topics must be submitted to the Observer Program by the observer provider within 24 hours after the observer provider becomes aware of the problem: observer harassment any prohibited action against observers concerns about vessel or processor safety any observer illness or injury that prevents them from completing their duties any information, allegations or reports regarding observer conflict of interest or breech of the observer standards of behavior.

The proposed rule specifies certification and decertification requirements for observers and establishes probation, suspension, and decertification measures that NMFS may take to discipline problem individuals. The appeals process provides observers with a way to submit evidence and to argue in opposition to a suspension or decertification notice. This information is used by the NMFS observer program staff to ascertain if observers are fulfilling their responsibilities and duties as prescribed by NMFS. Observers voluntarily submit information for an appeal. Not all individuals are expected to respond. It is anticipated that a maximum of two observers per year will submit responses within 30 day of being notified that they are suspended or decertified.

The information collected, from observer providers (transcripts, training and debriefing registration,

notification of physical examination, projected observer assignments, observer weekly deployment/logistics reports, observer debriefing registration disclosure statement, and reports of observer harassment, observer safety concerns, or observer performance problems) and the information collected from observers (evidence and to argue in opposition to a suspension or decertification notice) will not be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response number 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. Because the information collected is from commercial operations, under the Magnuson Act (16 U.S.C. 1801 et seq.), all data submitted are treated in accordance with NOAA Administrative Order 216-100, Protection of Confidential Fisheries Statistics. The information collected under this regulatory package will be managed by NMFS on a computer network in accordance with relevant IT security policies and regulations such as the standards set out in Appendix III, "Security of Automated Information Resources," OMB Circular A-130; the Computer Security Act; and the Government Information Security Reform Act.

3. <u>Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.</u>

No improved information technology has been identified as a practical means for reducing the burden on the public. The appeals process and submission of documentary evidence or petitions are unique to each observer's situation and must be signed by the individual submitting the documents. A maximum of two submissions are expected annually.

The periodic reports and information submitted by observer providers consist of extractions of the required data from their existing database systems into a report form that is then submitted by FAX transmission or e-mail to NMFS.

4. Describe efforts to identify duplication.

Information collections provided voluntarily by observer providers in the whiting fishery, are similar to collections required by regulation in the federal groundfish fishery off Alaska. Approval for the collection of information for observers in the Alaska fisheries has been approved under OMB #0648-0318. The whiting observer program is currently administered by the Northwest fishery Science Center in cooperation with Alaska fishery Science Center's North Pacific Groundfish Observer Program. Because the observer providers that supply observers for the whiting fishery are permitted to provide observers for the Alaska groundfish fishery, the information collections are provided in the same manner as is done for observers deployed in Alaska. If an individual observer

has been deployed in the Alaska groundfish fishery prior to the whiting fishery, information such as the notification of the observer's physical examination, and portions of the training/briefing registration materials are already available to NMFS and do not need to be resubmitted for the whiting fishery.

The documentary evidence or petitions from observers that have been issued notices of suspension or decertification will be unique to the individual observer and their performance in the whiting fishery. There is no overlap with their performance while deployed as an observer in Alaska. Therefore, there is no duplication with the regulations at 50 CFR 679.50 which pertain only to an observer's performance as an observer in the Alaska groundfish fishery.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The application procedures and reporting requirements for observer providers do not have a significant impact on small entities.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

The information is required for the efficient operation of an observer program and must be submitted in the time frames requested. Collecting this information less frequently would jeopardize the goals and objectives of the observer program and the effective management of the west coast groundfish fishery. NMFS believes that data quality will be maintained by creating a regulatory structure for managing observer and observer provider performance.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

No special circumstances exist that would require information collection to be conducted in a manner inconsistent with OMB Guidelines except for the weekly reports which are needed more frequently for effective management of the program.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A *Federal Register* notice of proposed rulemaking will be published that solicits advance public comment on the collection.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gifts to respondents are provided under this collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*). It is also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics. These procedures have been implemented under the NMFS Operations Manual entitled, "Data Security Handbook for the Northwest-Alaska Region, National Marine Fisheries Service."

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This collection of information does not include any sensitive information.

12. Provide an estimate in hours of the burden of the collection of information.

See tables 1, 2 & 3 for details.

The estimated number for all responses is 222. The estimated total burden hours of the collection of information for all respondents is 51 hours. The annual cost for labor necessary to prepare the collection is estimated to be \$1,070.5.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

See tables 1, 2 & 3 for details.

No capital or significant start up costs are associated with this information collection. Additional costs associated with this collection include: costs associated with compiling the information, running reports, mailing and faxing, fee for college transcripts and physician fees for physical exams. The annual costs of submitting the reports by fax and by mail are not expected to exceed \$481 and include: \$8 to submit college transcripts and disclosure statements; \$2 to submit information for an appeal; \$360 to submit training/briefing registrations; \$45 to submit notification of observer' physical exam.; \$18 to submit lists of projected assignments; \$18 to submit weekly logistics reports; \$18 to submit debriefing registrations, and \$12 to submit reports on harassment, safety or performance concerns. The annual costs of obtaining college transcripts and physical exams is not expected to exceed \$377.5. For obtaining college transcripts it is estimated to cost \$40 for all responses and for physical exams it is expected to cost \$337.5 per year for all responses.

14. Provide estimates of annualized cost to the Federal government.

The review of suspension or decertification appeals from observers is estimated to take NMFS staff about 1 hour per appeal. Since it is estimated that a maximum of 2 appeals will be received annually,

the total burden to NMFS is expected to be 2 hours. At \$24 dollars per hour the cost to NMFS is expected to be \$48 annually.

The training, briefing and debriefing registration information, including the notice of physical examinations, is estimated to take about 20 minutes per observer to process and enter into the NMFS database. With 30 observers per year this is estimated to be about 10 hours annually. The projected observer assignments and weekly deployment/logistics reports are expected to take about 10 minutes per response to process and enter into the NMFS database. It is estimated that (30 assignment +90 deployment) 120 reports per year will be received for a total annual burden of 30 hours. The review of and response to reports of observer harassment, safety or performance concerns is estimated at 1 hour per report. With an estimate of 2 reports per year this is expected to be an annual burden of 2 hours. The total annual burden on the government for review and processing information from observer providers is 42 hours. At \$24 dollars per hour this would be an annual cost of \$1,008.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

This is a new collection

16. For collections whose results will be published, outline the plans for tabulation and publication.

No plans exist for publishing the information collected.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

No forms would be developed by NMFS or its designated agent. The preamble of the final rule published in the <u>Federal Register</u> will notify the public of the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification statement in this proposed collection of information.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods

Table 1. OBSERVER SUBMISSIONS TRAINING/BRIEFING REGISTRATION MATERIALS Number of respondents (30 observer *1/4 =7.5)......8 The number of observers is multiplied by ¼ because most are prior observers and submit the information for participation in the Alaska groundfish fishery and would not be required to submit again. Time requirement per response for each candidate to obtain college transcript & to prepare disclosure statement 15 min Total annual time for all respondents to obtain college transcript & to prepare disclosure statement....2 hr Total annual cost for obtaining and preparing responses (2 hr x\$25 per hour=\$50).....\$50 Total annual cost for all respondents to submit college transcript & to prepare disclosure statement Note: The observer candidate's time and cost in preparation of a resume is excluded from the estimated burden of this information collection because resumes routinely are required by most employers, including observer providers. However, NMFS's requirement that candidates successfully complete specified college course work requires that college transcripts be submitted. Thus the time and costs associated with submitting transcripts, as well as the disclosure statement on any criminal record are included. APPEALS PROCESS FOR SUSPENSION AND DECERTIFICATION Total number of responses Cost per hour in dollars.....\$30 Annual cost to prepare reports (8 hours x \$30)\$240 Mailing costs \$1.00/response x 2......\$2 Total mailing costs for all responses....\$242 Annual cost per respondent (\$242 * 30 observers)\$8

Table 2. OBSERVER PROVIDERS SUBMISSIONS	
Number of respondents (providers) Number of observers deployed annually	4
Training/briefing registration Number of annual training/briefing registrations	30
Time requirement for each training/briefing registration	7 min
Cost per hour.	
Annual cost for training/briefing registration (3.5 hours x \$30/hour)	\$105
Cost to submit report by fax (30 x \$6 per page x 2 pages)	\$360
b) Notification of observer physical examination	20
Number of notifications per year Time requirement for each notification of observer physical examination	
Annual time for notification (30 registrations x 2 min/60 min)	1.0 hours
Cost per hour in dollars	\$30/hour
Annual time burden per response (2 min/60 min)	0.03 hours
Time requirement for each physical examination	2 hours
Annual time requirement for physical examinations (30 observer x ½ year = 7.5 observers x 2 hours)	15 hours
(The number of observers is multiplied by ¼ because most submit the information for participatio fishery)	n in the Alaska groundfish
Cost per physical exam	¢45
Annual costs of exams (30 observer x ½ year = 7.5)	\$43 \$337.5
Cost to submit report by fax (30 x \$6 per page x 1 page x 1/4 year)	\$45
c) Projected observer assignment information	20
Number of observer assignments per year	
Annual time for observer assignments (30 assignments x 7 min/60 min)	3.50 hours
Cost per hour in dollars	\$30
Cost to submit report by fax (30÷10 records per page=3 pages x \$6 per page)	
Cost to should report by fax (50-10 records per page-5 pages x \$6 per page)	
d) Weekly deployment/logistics report Number of deployment/logistics reports per year (30 deployments x 3 weeks/year)	90
Time for each deployment/logistics report	7 min
Annual time for deployment/logistics report (90 reports x 7 min/60 min)	
Annual cost for deployment/logistics reports (10.50 hour x \$30/hour)	\$315
Annual time burden per response (7 min/60 min)	0.12 hours
Cost to submit report by fax (30÷10 records per page=3 pages x \$6 per page)	\$18
e) Debriefing registration Number of debriefing registrations per year	30
Time for each debriefing registration	7 min
Annual time for debriefing registration (30 debriefings x 7 min/60 min)	
Annual cost for debriefing registration (3.5 hours x \$30/hour)	\$105
Cost to submit report by fax (30÷10 records per page=3 pages x \$6 per page)	\$18
f) Reports on observer Harassment, safety, or performance concerns Annual number of reports	2
Time for each report	
Annual time requirement for reports 4 providers x 0.5 reports x 2 hours)	4 hours
Cost per hour in dollars	\$30 \$120
Cost to submit report by mail (2 reports x 1 page x \$6 per page)	
Summary	
Number of respondents (providers 4 + 7.5 observers)	11.5
Number of responses	212
Annual time requirement for all reports	
Annual costs to prepare collection (labor cost \$/80 + physical exams \$558)	

Table 3. Summary of Burden Hours and Costs Presented in Tables 1 & 2									
Record type	Annual # Respondent s per year	Annual # Responses per year	Total Annual hours	Annual cost to obtain materials	Annual cost of burden hours to prepare collection	Method of submissi on	* Annual Cost to submit		
Observer submissions (totals)	10	10	10	\$40	\$290	NA	\$10		
College transcript & disclosure statement	8	8	2	\$40	\$50	mail	\$8		
Appeals Process for Suspension and Decertification	2	2	8	\$0	\$240	mail	\$2		
Observer providers Reporting (totals)	11.5	212	41	\$337.5	\$780.5		\$471		
a) training/briefing registration b) notification of physical exam. i) provider notifies NMFS ii) observer' physical exam. c) Lists of projected assignments d) weekly logistics reports e) debriefing registration f) reports on harassment, safety or performance concerns	a) 4 b) i) 4 ii) 7.5 c) 4 d) 4 e) 4 f) 2	a) 30 b) i) 30 ii) n/a c) 30 d) 90 e) 30 f) 2	a) 3.5 b) i) 1 ii) 15 c) 3.5 d) 10.5 e) 3.5 f) 4	a) \$0 b) \$0 i) \$0 ii) \$337.5 c) \$0 d) \$0 e) \$0 f) \$0	a) \$105 b) i) \$30 ii) \$0 c) \$105 d) \$315 e) \$105 f) \$120	a) Fax b) i) Fax ii) n/a c) Fax d) Fax e) Fax f) mail	a)\$360 b) i) \$45 ii)n/a c) \$18 d) \$18 e) \$18 f) \$12		
TOTALS	21.5	222	51	\$377.5	\$1,070.5	NA	\$481		